

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOHN CARFORA, SANDRA PUTNAM, and
JUAN GONZALES (aka Gonzalez)
individually and as representatives of a
class of similarly situated individuals,

Movants,

v.

PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,

Respondent.

Misc. No. 1:25-cv-12013

**UNDERLYING ACTION
PENDING**

*Carfora v. Tchrs. Ins. & Annuity Ass'n
of Am.*, No. 1:21-CV-8384-KPF
(S.D.N.Y.).

**MOTION TO COMPEL PRESIDENT AND FELLOWS OF HARVARD
COLLEGE TO COMPLY WITH SUBPOENA TO PRODUCE DOCUMENTS**

Plaintiffs in the underlying action, *Carfora, et al. v. Teachers Insurance and Annuity Association of America, et al.*, No. 1:21-cv-08384 (S.D.N.Y.), for the reasons stated in the accompanying memorandum of law and declaration of Patrick R. Kutz, respectfully move this Court pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i) and the United States District Court for the District of Massachusetts Local Rule 37.1 to compel nonparty The President and Fellows of Harvard College (“Harvard”) to comply with Plaintiffs’ Subpoena to Produce Documents, Information, or Objects or To Permit Inspection of Premises in a Civil Action dated February 10, 2025.

REQUEST FOR ORAL ARGUMENT

Movants believe that oral argument will assist the Court and respectfully request oral argument.

Date: July 17, 2025

Respectfully submitted,

/s/ Christopher C. Naumes

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**Pro Hac Vice Motion Forthcoming*

*Counsel for Movants Individually & as
Representatives of the Proposed Class*

LOCAL RULE 7.1(a)(2) AND 37.1 CERTIFICATION

I hereby certify that the Schlichter Bogard LLC attorneys have conferred with counsel for Respondent for the purpose of attempting to narrow and/or resolve the discovery dispute at issue in this Motion prior to making this Motion. Those efforts were unsuccessful. Details are included in the Memorandum in Support of this Motion and the Declaration of Patrick R. Kutz and its accompanying exhibits.

/s/ Christopher C. Naumes

Christopher C. Naumes